Front Royal Power Plant
Public Hearing – 11/9/10

Thank you for the opportunity to comment tonight as part of the public record. My name is Martha Bogle. I'm the Superintendent of Shenandoah National Park.

First, let me share that there are only 58 designated National Parks in the entire United States, and Shenandoah National Park is the only one in Virginia. National parks are truly special places. The National Park Service is charged with managing these special places in such a way as to leave the park's natural and cultural resources unimpaired for current and future generations. As you can imagine, keeping something from becoming impaired is a challenge in a rapidly changing world.

Because these places are so special, National Parks are typically categorized as Class 1 areas in the Clean Air Act -- areas that deserve the greatest protection under the law. Unfortunately, you may already know that our park's natural resources face many threats now.

One of the most critical threats is how air pollution impacts natural ecosystems and the visitors who enjoy them. Over the past few decades, we have scientifically-documented longstanding problems with air quality at Shenandoah – ranging from poor visibility to the ecological impacts of acid deposition.

Reduced visibility and haze impacts the opportunity for visitors to enjoy park scenery. Two of the most important features in the park are the Skyline Drive and the Appalachian Trail. Both routes are key to the purpose, development, and growth of the park and are considered essential to one of the most popular park experiences -- viewing the breathtaking scenery in and from the Blue Ridge Mountains. Waves of visitors entering through the Front Royal Entrance Station come to see the views. Visitation at this single entrance to the park often exceeds 76,000 in October alone. Such visitors also have a significant influence on our area's economy all year. Studies indicate that Shenandoah National Park generates over 65 million dollars annually for the communities adjacent to the park.

Analysis of the modeling data for the proposed generating facility approximately 4 miles from the park boundary indicates that the station's plume will impact the visibility in the far northern portions of Shenandoah National Park. Impacts are characterized as infrequent, but potentially severe. We believe these projected visibility impacts will negatively affect the visitor's experience at Shenandoah National Park.

Next, we already know acid deposition (also known as acid rain) harms our park watersheds. We have collaborated with University of Virginia scientists for 30 years to better understand these chronic impacts to water quality and the fish and other organisms in park streams. The impact in some cases is severe. In fact, the Virginia Department of Environmental Quality has already identified several streams in the park as "impaired" directly as a result of acid deposition (according to the Clean Water Act guidance). Some of the streams in the Southern portions of the park occasionally flow at the same acidity level as lemons. Excessive stream acidity kills aquatic life and disrupts ecological systems in Shenandoah National Park.

Scientific models indicate that the proposed generation facility would significantly contribute to nitrogen acid deposition in the northern portions of Shenandoah National Park. Research informs us that some of these northern watersheds are sensitive to acid deposition, and we believe the projected impacts from the generating facility will negatively affect these park areas.

The National Park Service plans to submit formal written comments before the November 24th deadline. We have been in discussions with the Virginia Dept. of Environmental Quality and the Virginia Electric and Power Company (Dominion) to reduce or mitigate projected emissions from this proposed facility to mutually acceptable levels. We will continue to work with both organizations in an attempt to address the National Park Service's remaining concerns.

Thank you again for the opportunity to comment.